

1 Stephen R. Cochell
Admitted Pro Hac Vice
2 *srcochell@gmail.com*
5850 San Felipe, Ste. 500
3 Houston Texas 77057
Telephone: (713) 436-8000
4 Facsimile: (213) 623-2000

5 Allan Grant (SBN#213658)
Grant's Law Firm
6 17351 Greentree Drive
Riverside, California 92503-6762
7 Telephone (888)937-7555
Facsimile (866)858-6637
8

9 Attorneys for Defendant
JASON EDWARD THOMAS CARDIFF
10

11 UNITED STATES DISTRICT COURT
12 CENTRAL DISTRICT OF CALIFORNIA
13

14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 vs.

17 JASON EDWARD THOMAS
18 CARDIFF,

19 Defendant.
20
21
22

Case No. 5:23-cr-00021-JGB

**JASON CARDIFF'S *EX PARTE*
APPLICATION FOR AN ORDER
EXTENDING INTERNATIONAL
TRAVEL AND RETURNING HIS
PASSPORT**

*[Filed concurrently with Declaration of
Stephen R. Cochell and [Proposed]
Order]*

EX PARTE APPLICATION

Jason Cardiff has requested that counsel file this *ex parte* application extending his travel to Ireland from on or about December 20, 2024 for a period of thirty additional nights returning on or about January 19, 2024. The reason for the request is the need for continued medical testing and treatment in Ireland, as set forth below.

Background

Mr. Cardiff has been released on a \$530,000 appearance bond, justified in the amount of \$500,000 with full deeding of real property. His release conditions include, among other conditions: a travel restriction to the Central District of California and the Southern District of Texas; a curfew between the hours of 8:00 p.m. and 8:00 a.m.; and placement in the custody of third-party custodian, Attorney Stephen Cochell. Lilia Murphy and Brian Kennedy executed affidavits of sureties in support of the bond. Ms. Murphy also deeded her home as collateral.

Mr. Cardiff is living with Attorney Cochell in Kingwood, Texas, and he is being supervised by United States Probation Officer Jack Sherrod of the Southern District of Texas.

The Court granted permission to travel to Ireland to assist his wife for her medical needs and for his ten year old daughter. As set out in his request for this travel, Mr. Cardiff had also scheduled necessary medical appointments for himself, including a consultation with his cardiologist. Mr. Cardiff had unanticipated health problems. Dr. M.S., Bellbridge Medical Centre referred him for treatment finding him “medically unfit to fly until further notice” pending further testing. Mr. Cardiff underwent medical testing and evaluations as recommended in various records submitted to the Court under seal.¹ The results of testing and evaluation by his

¹ As previously stated in his prior request for extension of his travel to Ireland, Mr. Cardiff does not have medical insurance in the United States but does have full

1 consulting cardiologist will be submitted under seal.

2 During the ten-plus months of pretrial release, Mr. Cardiff has consistently
3 complied with all court orders and has previously traveled both domestically and
4 internationally with court approval without incident. His record reflects no
5 violations, demonstrating his commitment to adhering to all conditions of his
6 release. Mr. Cardiff will return to Texas as scheduled and will maintain regular
7 contact with his Pretrial Officer, Ryan McClellan, while traveling. Additionally, Mr.
8 Cardiff will supply Mr. McClellan and Pretrial Services with a full travel itinerary
9 prior to his departure.

10 Sureties Lilia Murphy and Brian Kennedy do not oppose this request.
11 United States Probation Officer Ryan McClellan was contacted on December 12,
12 2024 and, on December 13, 2024, he stated that he was new to Jack Sherrod's case
13 load and believed that he had to obtain guidance from Pretrial Services' Los
14 Angeles Office. Mr McClellan acknowledged that Mr Sherrod had not opposed Mr.
15 Cardiff's international travel on prior occasions and that Mr. Sherrod considered Mr.
16 Cardiff to be cooperative with Pretrial Services.

17 DOJ Valerie Makarewicz and Manu Sebastian were contacted on November
18 12, 2024 and, in response, stated that the Government opposed Defendant's request.

19 WHEREFORE, Defendant requests this Honorable Court extend Mr.
20 Cardiff's international travel for an additional thirty days until January 19, 2025, to
21 allow Defendant to participate by videoconference in hearings set by the Court for
22 January 13, 2025 at 2:00 p.m. and to allow Defendant to participate in any other
23 hearings set by the Court during the period of time extended for Defendants medical
24

25 _____
26 medical insurance coverage in Ireland. It is not feasible to timely obtain insurance
27 in the United States that would cover the expensive testing that needs to be
28 conducted for Mr. Cardiff. The Court allowed Mr. Cardiff to remove his GPS
monitoring bracelet to undergo EGK testing. Dkt. ____.

1 testing, evaluation and treatment.

2
3 Dated: December 13, 2024

4
5 By: /s/ Stephen R. Cochell

6 Stephen R. Cochell

7 Attorney for Defendant

8 JASON EDWARD THOMAS CARDIFF

9
10 **SERVICE LIST**

11 I HEREBY DECLARE THAT THE FOLLOWING COUNSEL HAVE BEEN
12 SERVED WITH THIS DEFENDANT JASON CARDIFF'S NOTICE OF MOTIO
13 AND MOTION TO SUPPRESS EVIDENCE THROUGH THE COURT'S ECF O
NEXT GEN ELECTRONIC FILING SYSTEM:

14 E. Martin Estrada

United States Attorney

Mack E. Jenkins

15 Assistant United States Attorney Chief, Criminal

Division Rance A. Katzenstein

16 Assistant United States Attorney Chief, Criminal

Division Valerie Makarewicz

17 Assistant United States Attorney Major Frauds Section

1100 United States Courthouse

312 North Spring

Street Los Angeles,

19 CA 90012

Telephone: (213) 894-0756 Facsimile: (213) 894-6269

20 E-mail: Valerie.Makarewicz@usdoj.gov

21 Amanda Liskamm

Director, Consumer Protection Branch Manu J. Sebastian

22 Brianna M. Gardner

Trial Attorneys

23 Consumer Protection Branch

U.S. Department of Justice

24 450 Fifth Street NW, Suite 6400 Washington, DC 20001

Telephone: (202) 514-0515 Facsimile: (202) 514-8742

25 E-mail: Manu.J.Sebastian@usdoj.gov

Brianna.M.Gardner@usdoj.gov

27 /S/ Stephen R. Cochell

Stephen R. Cochell